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PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Western DIVISION

Christina Alexandria  
Taylor-Loper

(Enter above the full name  
of the Plaintiff[s] in this  
action).

Case No. 5:22-cv-00361-M

vs.

Sam's Club/Walmart Assoc Inc

(To be assigned  
by the Clerk of  
District Court)

(Enter above the full name of  
ALL Defendant[s] in this action.  
Fed.R.Civ.P.10(a) requires that  
the caption of the complaint  
include the names of all the  
parties. Merely listing one  
party and "et al." is insufficient.  
Please attach additional sheets if  
necessary).

COMPLAINT

1. Plaintiff resides at 4916 Shawnee Ct.  
Garner N.C. 27529

2. Defendant(s) name(s):

Sam's Club/Walmart  
Associates Inc.

Location of principal office(s) of the named defendant(s):

3001 Calvary Dr. Raleigh N.C. 27609

Nature of defendant(s) business:

Retail

Approximate number of individuals employed by defendant:

100 at each store

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

- (A) ☐ Failure to employ me.
- (B) ☒ Termination of my employment.
- (C) ☒ Failure to promote me.
- (D) ☒ Other acts as specified below:

I was sexually harrassed by my manager when I expressed interest in being promoted

5. Plaintiff is:

(A) \_\_\_\_\_ presently employed by the defendant.

(B) ☒ not presently employed by the defendant.

The dates of employment were 02/2014 - 07/2021

Employment was terminated because:

(1) ☒ plaintiff was discharged.

(2) \_\_\_\_\_ plaintiff was laid off.

(3) \_\_\_\_\_ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A) \_\_\_\_\_ my race.

(B) \_\_\_\_\_ my religion.

(C) ☒ my sex.

(D) \_\_\_\_\_ my national origin.

(E) ☒ other as specified below:

I was fired during an approved Leave of  
Absence, after filing a charge against my  
former employer

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Robert Oates

Jason Malone



8. The alleged discrimination occurred on or about mid 2019  
until I was fired in July 2021

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

When I originally applied for a promotion around July/June of 2019, Robert Oates was the hiring manager. I came to both Robert and Jason on several occasions but was told to reapply because my application got lost in the system. Even after re-applying, the position was given to employees with less experience and even un-qualified. After telling Robert how I felt, he invited to come clean his home to make extra money. He exposed himself to me and also harassed me on social media. When I wouldn't comply, he didn't give me an interview until I asked him months later. When he got me alone he cut the lights off + grabbed me. When I reported this to Jason,

10. The alleged illegal activity took place at:

Sam's Club (Calvary dr.) + Robert's house.

11. I filed charges with the Equal Employment Opportunity

Commission regarding defendant(s) alleged discriminatory conduct

on or about March 2020

I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on

June 10th 2022

he still had us scheduled together days later.

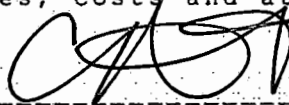
I was granted a leave due to stress in workplace and was fired during my leave by Jason/Sam's Club.

12. I seek the following relief:

- (A) ☒ recovery of back pay;  
(B) ☐ reinstatement to my former job;  
(C) ☒ trial by jury on all issues so triable;

and any other relief as may be appropriate, including  
injunctive orders, damages, costs and attorney's fees.

9/8/2022  
date



Signature of Plaintiff

4916 Shawnee Ct.  
Garner N.C. 27529  
919-614-7946

Address and Phone Number of Plaintiff